

**REMARKS**

The Examiner's Action mailed on September 30, 2005, has been received and its contents carefully considered.

In this Amendment, Applicants have editorially amended the specification, and claims 1-5 and 7-11. Claims 1 and 7 are the independent claims, and claims 1-12 remain pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

Claims 7-12 have been rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirements. In particular, the Examiner notes that "the third compartment" in independent claim 7 should instead read as "the third opening". The drawings have also been objected to for not showing the third compartment. In response, "the third compartment" has been rewritten as "the third opening", as proposed by the Examiner's Action, thus rendering this rejection and objection moot.

Claims 1, 3, 5-7, 9 and 11-12 have been rejected under 35 U.S.C. 102(b) as being anticipated by *Bidiville et al.* (U.S. Patent No. 6,218,659). It is submitted that these claims are patentably distinguishable over the cited reference for at least the following reasons.

Claims 1 and 7 both recite an optical apparatus for use on an object surface. The optical apparatus includes a semiconductor package structure, having a first compartment and a second compartment, wherein the first compartment has a first opening and the second compartment has a second opening.

*Bidiville et al.* teach a dual layer optical ball for a pointing device. The optical assembly 2290 includes an optical housing 2300 having a pair of angular bores 2310A-B, each of which receives, respectively, one of the LEDs 730 (see FIG. 23B and col. 26, lines 9-12).

However, *Bidiville et al.* fail to disclose or suggest a semiconductor package structure disposed in the optical apparatus, having a first compartment and a second compartment, as recited in claims 1 and 7. Thus, *Bidiville et al.* fail to disclose or suggest all of the features of claims 1 and 7. Applicants therefore respectfully request that the rejection of independent claims 1 and 7, and dependent claims 3, 5-6, 9 and 11-12, be withdrawn, and these claims passed to issue.

Claims 2 and 8 have been rejected under 35 U.S.C. 103(a) as being obvious over *Bidiville et al.* in view of *Davis et al.* (U.S. Patent Application No. 2003/0034959). Claims 4 and 10 have been rejected under 35 U.S.C. 103(a) as being obvious over *Bidiville et al.* in view of Applicants' admitted prior art. Applicants respectfully traverse these rejections for the following reasons.

*Davis et al.* teach an apparatus for controlling the position of a screen pointer for an electronic device. An optical sensor chip 16 is mounted on PCB 36. A bottom surface of the optical sensor chip 16 includes an array of photodetectors 84 positioned over a hole 36A of PCB 36 (see Figs. 2 and 3, and paragraph [0017]). However, *Davis et al.* do not disclose or suggest a semiconductor package structure having a first compartment and a second compartment, as recited in independent claims 1 and 7 of the present application.

Similarly, Applicants' admitted prior art also fails to disclose or suggest a semiconductor package structure having a first compartment and a second compartment, as recited in independent claims 1 and 7. Thus, since neither *Bidiville et al.*, *Davis et al.*, nor Applicants' admitted prior art disclose or suggest a semiconductor package structure having a first compartment and a second compartment, as recited in independent claims 1 and 7, it is submitted that dependent claims 2, 4, 8 and 10 are *prima facie* patentably distinguishable over

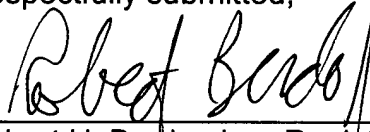
the cited references for at least the same reasons as independent claims 1 and 7. It is requested that these rejections be withdrawn, and that these claims be allowed.

It is submitted that this application is in condition for allowance. Such action and the passing of this case to issue are requested.

Should the Examiner feel that a conference would help to expedite the prosecution of this application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

Should any fee be required, the Commissioner is hereby authorized to charge the fee to our Deposit Account No. 18-0002, and advise us accordingly.

Respectfully submitted,



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Date

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